

UNITED STATES BANKRUPTCY COURT
DISTRICT OF RHODE ISLAND

IN RE:
Inez Travers,
Debtor

CHAPTER 7
CASE NO. 11-12650-ANV

MOTION TO TERMINATE LOSS MITIGATION ORDER

Now comes Bank of America, N.A. and respectfully requests that this Court terminate the Loss Mitigation Period and vacate the Order granting the Loss Mitigation Request. In support thereof, Bank of America states as follows:

1. On August 15, 2011, Debtor's counsel was contacted via email with a request for documents needed to proceed with the loss mitigation review.
2. On August 22, 2011 and August 29, 2011, the office of undersigned counsel followed up with Debtor's counsel on the document request.
3. As of today, the documents have not been provided.
4. As such, the Debtor has failed to comply with the terms of the loss mitigation order which requires that a document request be responded to within fourteen (14) days.

WHEREFORE, Bank of America respectfully requests that the Court vacate the Order granting the Loss Mitigation Request which entered August 10, 2011. Bank of America requests permission to assess the Debtors' account \$400.00 in legal fees for its participation in the Loss Mitigation Program.

Respectfully submitted,

/s/ Elizabeth A. Lonardo
Elizabeth A. Lonardo, Esquire
RI #7714
HARMON LAW OFFICES, P.C.
P.O. Box 610345
Newton Highlands, MA 02461-0345
781-292-3900
ribk@harmonlaw.com

Dated: September 6 , 2011

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CERTIFICATE OF SERVICE

I, Elizabeth A. Lonardo, Esquire, state that on September 6, 2011, I electronically filed the foregoing Motion to Terminate with the United States Bankruptcy Court for the District of Rhode Island using the CM/ECF System. I served the foregoing document on the following CM/ECF participants:

Gary L. Donahue, Esquire, Assistant U.S. Trustee
Stacy B. Ferrara, Esquire, Chapter 7 Trustee
John B. Ennis, Esquire for the Debtor

I certify that I have mailed by first class mail, postage prepaid the documents electronically filed with the Court on the following non CM/ECF participants:

/s/ Elizabeth A. Lonardo
Elizabeth A. Lonardo, Esquire
RI# 7714

Inez Travers
25 Cantara Street
West Warwick, RI 02893